

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

IN RE:

TEXAS REIT, LLC

Debtor.

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CASE NO. 24-10120-smr

CHAPTER 11

**AMENDED CREDITOR'S OBJECTION TO CLAIM OF JOHN QUINLAN,
OMAR KHAWAJA AND OSAMA ABDULATIF
(Claim No. 9-1)**

This is an objection to your claim in this bankruptcy case. This objection asks the Court to disallow (eliminate), reduce, or modify your claim as set forth in this objection. If you do not file a written response to this objection within 30 days from the date of mailing of this objection, the Court may disallow (eliminate), reduce, or modify your claim as set forth in this objection, without a hearing being held.

Any response to this objection must explain your position and be timely filed with the United States Bankruptcy Clerk, Western District of Texas, mailing address of applicable Clerk's office. If a timely response is filed, the Court will then set a hearing on the objection, and you will be provided with notice of the date, time, and place of the hearing. If you do not attend the hearing, the Court may decide that you do not oppose the objection to your claim.

TO THE HONORABLE U.S. BANKRUPTCY JUDGE:

COME NOW Dalio Holdings I, LLC and Dalio Holdings II, LLC and file this Objection to Claim of John Quinlan, Omar Khawaja and Osama Abdulatif and would show as follows:

1. John Quinlan, Omar Khawaja, and Osama Abdulatif have filed what they claim to be a secured claim in the amount of \$4,847,894.68.
2. The claim is based upon three judgments, NONE of which were against the Debtor as follows:
 - a. Jetall Companies, Inc. v. Richard Heil, Todd Oakum and Renee Davy—attorneys' fees awarded in favor of Defendants;

b. Jetall Companies, Inc. v. Hoover Slovacek, LLP—attorneys’ fees and sanctions awarded in favor of Defendant;

c. Osama Abdulatif and Abdulatif & Company, LLC v. Ali Choudhri and Houston Real Estate Properties, LLC—judgment in favor of Plaintiff against Defendants. The Defendants in this case filed a supersedes bond staying collection while the case is on appeal.

3. Claimants admit in their proof of claim, that they have filed lis pendens on property that this Debtor does not own. Somehow, the Claimants think it acceptable not only to file a meritless proof of claim in a chapter proceeding but to file lis pendens on real property having no relation to the judgment debtor.

4. The Claimants in this case filed an Adversary Proceeding in the Bankruptcy Court for the Southern District of Texas in which they alleged that Magnolia BridgeCo, LLC, Jetall Companies, Inc., Arabella PH 3201, LLC, 9201 Memorial Dr., LLC, 2727 Kirby 26L, LLC, Texas REIT, LLC, Dalio Holdings I, LLC, Dalio Holdings II, LC, Houston Real Estate Properties, LLC, Shahnaz Choudhri (the MOTHER of Ali Choudhri), Ali Choudhri, Shepherd-Huldy Development I, LLC, Shepherd-Huldy Development II, LLC and Galleria Loop Note Holder, LLC were alter egos of each other. In such adversary proceeding, Messrs. Quinlan and Khawaja claim to be the assignees of the judgments in favor of Richard Heil, et al and Hoover Slovacek, LLP.

5. Just like this case, the Claimants had no basis to file the Adversary Proceeding in the Southern District. The Debtor in the Southern District is not a judgment debtor in these state court proceedings and the Bankruptcy Court does not have subject matter jurisdiction over the state court claims.

6. By filing their proof of claim in this case, the Claimants have frustrated the rights of the Creditors and wrongfully filed lis pendens without any encumbrance claims or real property

claims that are required for filing of lis pendens. Claimants have shown their clear motivation to frustrate the bankruptcy process.

7. The Claimants should be sanctioned for bad faith and the filing of the false proof of claim.

WHEREFORE, Creditors, Dalio Holdings I, LLC and Dalio Holdings II, LLC, pray that Claimants be ordered to provide evidence to support the veracity of the Proof of Claim they filed under penalty of perjury and, if appropriate, that sanctions be awarded.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document has been served upon all registered ECF users appearing in this case and by regular mail to the attached Service List, pursuant to the Federal Rules of Civil Procedure on October 31, 2024.

/s/ Joseph F. Colvin, Jr.

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**The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f)
and Fed.R.Bank.P. 2002 (g)(4).**

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